

SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, DC 20554

> Re: WT Docket No. 17-200 Ex Parte Letter

Eversource Energy ("Eversource") submits this letter in response to the Wireless Telecommunications Bureau's request for comment regarding the 896-901/935-940 MHz ("900MHz") band in FCC WT Docket No. 17-200.

Eversource, a Fortune 500 and Standard & Poor's 500 energy company based in Connecticut, Massachusetts and New Hampshire, operates New England's largest energy delivery system. Eversource is committed to safety, reliability, environmental leadership and stewardship, and expanding energy options for its 3.7 million electric and natural gas customers.

Eversource is an incumbent in the existing 900MHz band and would be impacted directly by any rule changes the Commission may adopt. In a previous filing, Eversource requested additional information in order to take an informed position on the joint proposal submitted by the EWA and pdvWireless (PDV). Following further research and discussions with other impacted utilities, as well as with representatives of PDV, we have gained a better understanding of the proposal for realignment and broadband allocation.

Eversource is currently finalizing its strategy to meet long-term telecommunications systems needs across its territory for the next ten years. Eversource requires voice and data telecommunications services for the safe, reliable and efficient operation of the transmission, distribution electric and gas systems, and anticipates future growth in applications on these systems. Eversource hopes to increase penetration, capacity and security of telecommunications services such as increased Supervisory Control and Data Acquisition (SCADA) deployments, Distributed Generation, and Advanced Metering networks. In some cases this has been initiated by the States we serve, including the Massachusetts 'Grid Modernization' program before the Massachusetts Department of Public Utilities in Docket No. DPU-12-76-B.

Eversource has identified the aggregation of existing Narrowband mobile radio systems into a private broadband system as a potential cost effective solution to meet current and emerging requirements; however, the options for mobile broadband spectrum across our service territory are limited.

For these reasons, Eversource believes that the proposal could provide a viable option. We are open to considering a reallocation plan for our existing 900MHz systems and access to the proposed 3/3 MHz broadband for utilities and



2/2 MHz narrowband configurations, provided the implementation of any proposal has no unacceptable disruptions to critical electric and natural gas utility operations.

We would appreciate prompt resolution to inform our direction for the 2018 DPU 'Grid Modernization' program in Massachusetts and related activities.

Regards,

/s/

Matthew Acton

Manager Telecommunications Strategy

Eversource Energy – 107 Selden Street Berlin CT 06037

T: (+1) 860 665 6138 | C: (+1) 860 515 9561

E: matt.acton@eversource.com